US ERA ARCHIVE DOCUMENT

2006 EPA Freshwater Spill Symposium Portland, OR

Hurricanes
Katrina & Rita Upon
Entergy's Electrical
Transmission and
Distribution
Systems

Presented by:

Jeff Spillyar<mark>ds</mark>

Entergy Services, Inc.

Environmental Management



We're experienced at restoration...

- Andrew (Aug 1992) 250,000 customers
- Ice Storm (Feb 1994) 240,000 customers
- Georges (Sep 1998) 260,000 customers
- Dual Ice Storms (Dec 2000) 236,000 and 247,000
- Lili (Oct 2002) 243,000 customers
- Cindy (Jul 2005) 270,000 customers







...are recognized at being good at it...

- Received the EEI outage response or outage assistance award every year for the last seven consecutive years
 - Only utility to have won every year since the awards have been offered.



...utilizing a proven organizational approach...



System Outage Response Command Structure

System Command Center Jackson

Transmission Command Center New Orleans/Jackson

Transmission

Ops Centers

Distribution Operations
Command Center
(Located at states' Dist Ops HQs

Distribution Ops Centers

Transmission Grid Managers

Line Area Command Centers

Region

Command

Centers

(Fossil, Nuclear, Cust Service, Corp Communications, HR, Financial, etc.)

Other Entergy Business Units



...and we strive to continuously improve.

- Annual drills: April 2005 drill scenario was Cat 4 impacting New Orleans with 20' flooding
- Meetings with local officials & media (May 2005)
- Plan Improvements Spring 2005:
 - upgraded evacuation process
 - internal "IE StormNet" launched
 - upgraded external web site
 - improved outage mapping applications
 - incorporated lessons of 2004 Florida storms



Environmental Management's responsibilities:development of environmental emergency response plan...

ENTE EMERGE

Scope

EM

REST

This document details internal to the Environ or man-made disaster: Distribution and Trans these are damages the responsibilities for the (DOA&TG) Support, a

Delineation of Respo

In the event of a major etc., which initiates the Management (EM) pel affected will function ir Restoration (EO&R) C for functioning as the c the on-scene environn health and the environ state and local regulat EO&R organizations.

The EM System Emer as liaison between the EO&R organization. T for supporting the EM as, coordination of TSI DO Area or TG) EM st materials delivery, reg service that may requi

EM DOA&TG EO&R

For storm events such communication betwee System EO&R coordinates and the storm of the storm of

this contact will be to communicate possible support requirements for these DOA's and TG's, such as (but not limited to), additional environmental emergency response contractor support; or additional EM personnel, in the event that evacuation of the EM DOA&TG EO&R coordinator is required. For events, such as tornadoes and ice storms that are less predictable, contact will be made by the EM DOA&TG EO&R Coordinator(s) to the EM System EO&R Coordinator as soon as practical after damage information on the area affected is available.

Interface of the EM DOA&TG EO&R Coordinator with the DOA and TG EO&R Organizations

It is essential that an assessment of the environmental damage within the area affected occur as soon as possible after the situation has stabilized. This information will be gathered by personnel doing the electrical assessment, if practical, and communicated to the EM DOA&TG EO&R Coordinator as soon as possible. This information will be required for communication to regulatory agencies, environmental emergency response contractors and to the EM System EO&R Coordinator. The EM DOA&TG EO&R Coordinator(s) may provide direct support to the DOA or Transmission Grid EO&R Organization in compiling this information, as necessary.

Interface between EM DOA&TG EO&R Coordinator and Out-of-DO-Area or T Grid EM Support

If the size and nature of the incident dictates that additional environmental emergency response contractors are needed, response contractors currently used in other DO Areas or T Grids may be mobilized to the affected area. This action will be coordinated by the EM System EO&R Coordinator. When "out-of-DO-area" contractors are utilized, the EM personnel that normally work with these contractors will accompany them to the affected area. It will be the responsibility of the EM DOA &TG EO&R Coordinator to coordinate where the EM support staff and their environmental response contractors will be utilized, once they arrive in the affected area.

EM EO&R Organization Standard of Support

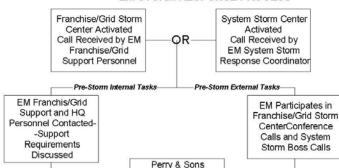
Environmental support actions pursuant to the EO&R will be conducted in accordance with all applicable federal, state and local regulations. Typically, regulatory agencies are preemptively notified when major storm incidents occur and are periodically updated as to the status of the recovery process and the magnitude of environmental damage sustained in the storm area.



Envi

June 1999

EM STORM RESPONSE PROCESS



ities:

Emphasizes pre-storm notifications to:

- Environmental response contractors
- Material/equipment suppliers
- Salvage/disposal vendors
- Analytical laboratories
- Regulatory agencies





Environmenta	2003 System Drill DRAFT Message PAGE of
develor	 Parallel and independent of main drill Parallel and dependent on the mail drill X Part of the mail drill
	Day One PMDay Two AMXDay Two PM
	Message for Group: AFFECTED NETWORK(S) Scenario Time: POST LANDFALL
	Message Statement
	Crews are scheduled to restore service into a large petrochemical complex. This facility has sustained heavy damage to its chemical storage facility. Cleanup of released chemicals has not been completed.
	Expected Actions to be observed
	What actions need to be taken?
	Explain/Demonstrate the process for contacting your Environmental Support representative.

representative.

representative.



Katrina's projected path changed late

ImpactWeather

Hurricane Katrina - Forecast Track

After crossing lower FL peninsula, originally projected to hit panhandle...

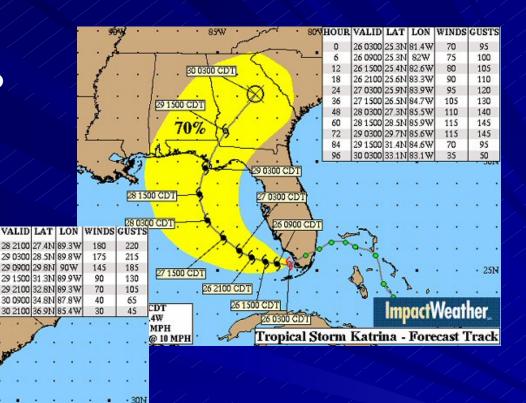
29 0300 CDT

30 0900 CD

29 0900 CDT

Position: 27.4N 89.3W Max Wind: 180 G220 MPH

Movement: NNW @ 11 MPH



...but moved much further west.





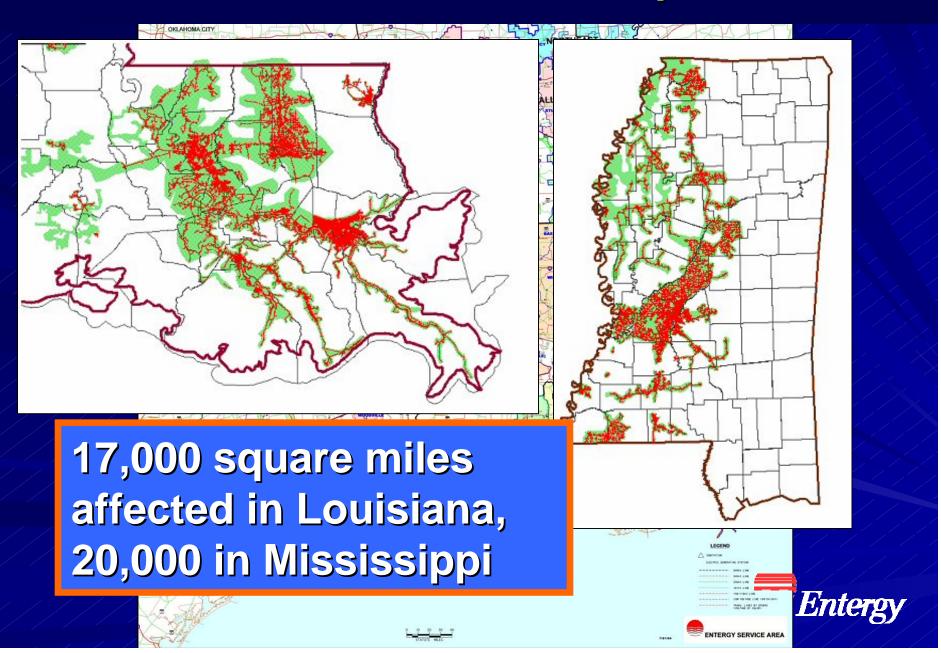
And then the breach...

Aftermath...





The destruction was widespread...



Unprecedented impact on Entergy 1.1 million customers out; severe flooding

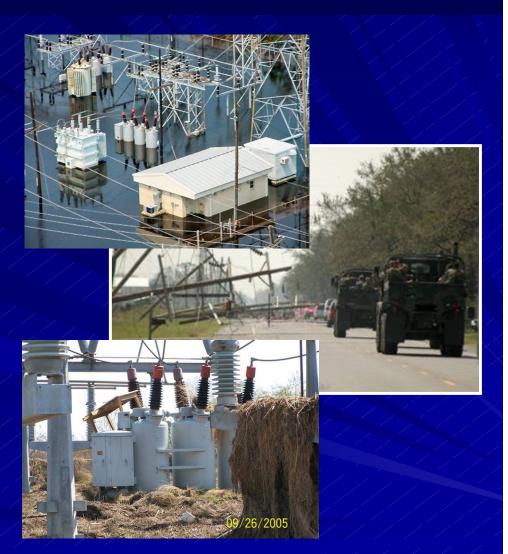


Katrina Storm surge approaches Michoud plant, photo by Entergy Michoud plant manager Don McCroskey



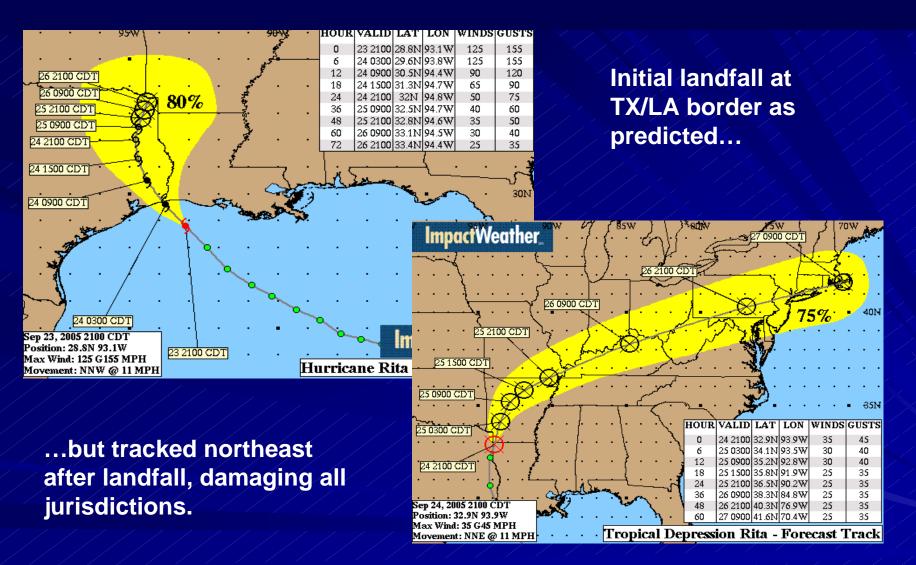
Katrina's unique challenges...

- Corporate HQ evacuated
- Employees' homes destroyed
- Resources pre-dedicated to Florida
- Security threats in New Orleans
- Flooded gas facilities
- Contractors' bankruptcy fears
- Inoculations for workforce
- Severe substation flooding
- Communications knocked out
- Massive scale/logistics challenge
- Gasoline/Diesel shortages
- Inaccessibility
- DOE/DHS coordination & reporting





...were followed by Rita...





...and Rita's challenges.

- Second worst storm in company's history - 800,000 outages
- Massive damage to transmission system; generation plants damaged & isolated
- Three days of rolling blackouts for 142,000 Texas customers
- Exhausted workforce
- Another huge logistical challenge
- Material shortages following Katrina
- Continued coordination with DOE
- ●Texas PUC "Tiger Team"





Total system impacts

- "SAFETY TRUMPS SPEED"
- 1.87 million total electric customers
- 145,000 gas customers
- 28,900 Distribution poles replaced
- 522 Transmission lines out of service
- 715 Substations out of service
- 29 fossil/1 nuclear units shut down









Restoration—the environmental piece

Initial Challenges:

- Communication in impacted areas (all forms)
- Environmental response contractors domiciled in the impacted areas were displaced by the storms
- Domiciled response contractor equipment damaged by floodwater
- Analytical laboratories in the impacted areas were unavailable
- Fuel, lodging and meals for "out-of-area" response contractors sent to impacted areas



Potential Major Environmental Issues

- Threat of chemical and infectious agent exposure to workforce
- Damage to oil-filled electrical devices
 - Overhead and pad-mount distribution transformers
 - Substations
- Much of transmission line damage occurred in coastal marsh areas
 - Emergency permits required from USACE and Louisiana Dept. of Natural Resources Coastal Management Division
 - Some of the line damage resulted in power outages to Port Fourchon "LOOP", and the Plantation and Colonial pipelines



A monumental support effort is launched

Recruited 13,000 tool workers and over 4500 support personnel.

More than 130 companies aided Entergy during Katrina and Rita restoration



What are the chemical exposure risks?



Subchapter B. Requirements for Emergency Notification

rule

§3915. Notification Requirements Discharges Which Cause I

- A. Notification to the DPS Emergency Hazardous Materials Hot
- 1. In the event of an unauthor cause an emergency condition, the di hotline by telephone at (225) 9 accepted 24 hours a day) immediate of time after taking prompt mean nature, quantity, and potential off-s considering the exigency of the circase later than one hour after learning emergency condition is any corresponding to the public, cause significant adversariant. Natification required by

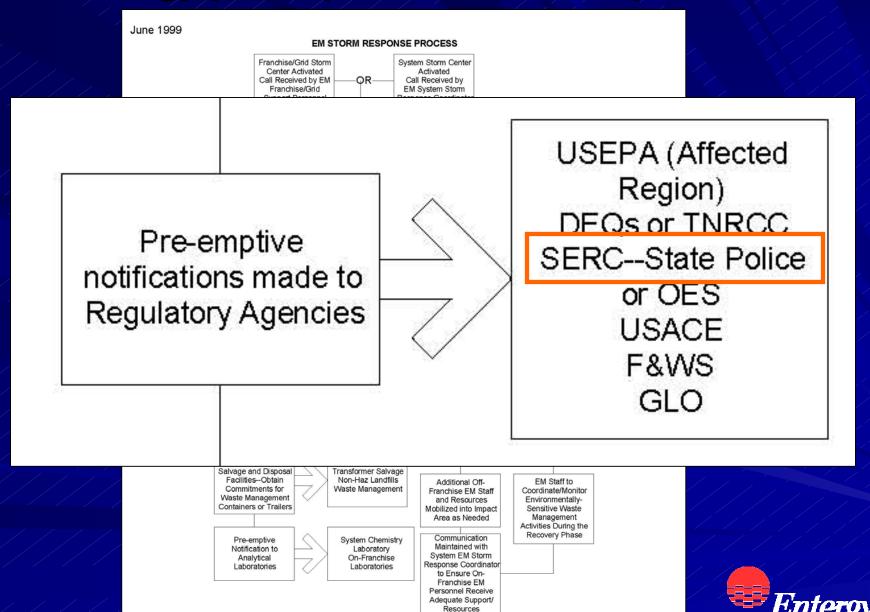
Uniform Hazardous Materials Reporting Form

		Incident #	
			Date / Time
Courtesy Call () Reportable () Pari	ish	Notified	/
Caller's Name		Occurred	/
Caller's Employer		Secured	/
Caller's Phone #			
Incident Location	City		
	City	Range Town	nship Section
Company			
CompanyName	Address	City	
Chaminal Invaluad	<u> </u>		0
	()	NV. K	
		ty R Liquid	
Did material go offsite? Yes No Any off-site protective action? Yes 1	Release to: Land No Road Closure	Water Shelter	Air Evacuation
Did material go offsite? Yes No Any off-site protective action? Yes 1	Release to: Land No Road Closure	Water Shelter Fire:	Air Evacuation Y () N (
Did material go offsite? Yes No Any off-site protective action? Yes ? Wind Direction Wind Speed	Release to: Land No Road Closure	Water Shelter Fire:	Air Evacuation Y () N (s: Y () N (
Did material go offsite? Yes No Any off-site protective action? Yes Yes Twind Direction Wind Speed Temperature	Release to: Land No Road Closure	Water Shelter Fire:	Air Evacuation Y () N (
Chemical Involved Hazard Class ID Did material go offsite? Yes No Any off-site protective action? Yes I Wind Direction Wind Speed Temperature Precipitation: None Rain O Details:	Release to: Land No Road Closure	Water Shelter Fire:	Air Evacuation Y () N (s: Y () N (
Did material go offsite? Yes No Any off-site protective action? Yes 1 Wind Direction Wind Speed Temperature Precipitation: None Rain 6	Release to: Land No Road Closure	Water Shelter Fire:	Air Evacuation Y () N (s: Y () N (
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Did material go offsite? Yes No Any off-site protective action? Yes 1 Wind Direction Wind Speed Temperature Precipitation: None Rain 6	Release to: Land No Road Closure	Water Shelter Fire:	Air Evacuation Y () N (s: Y () N (

property.) Notification required by this Subsection will be made regardless of the amount of the discharge.



Entergy preemptive notification process...



Entergy preemptive notification process...

SPILLYARDS, JEFFREY

From: SPILLYARDS, JEFFREY

Sent: Tuesday, August 30, 2005 9:41 AM

To: 'LA State Police - Bob Hayes'

CC: CALLE, FERNANDO J; HAYDEN, ROBERT M; BOURGEOIS, JASON

Subject: Entergy release reporting

Importance: High

Bob,

Regarding transformer spill reporting, we are attempting to satisfy DPS reporting requirements; however, as you can imagine, we're going to have a lot of stuff to report. To avoid bogging down the SPOC, do you prefer that we do daily verbal summaries until things get less chaotic? The same question applies to the follow-up whiten reports. can we do daily spreadsheet summaries of activities as opposed to individual written reports? Also, I called last weekend and requested to be put on the DPS haz mat release notification e-mail list like you arranged for the last hurricane alert. Can you please follow-up on that request? This is going to be a fun one.

Thanks and take care---Jeff



SPILLYA	SPILLYAF	SPILLYARI	SPILLYARE	SPILLYARD	SPILLYARDS, J	EFFREY
From: Sent: To: Subject:	From: Sent: To: Subject:	From: Sent: To: Subject:	From: Sent: To: Subject:	From: Sent: To: Subject:	From: Sent: To: Subject:	TGuidry@dps.state.la.us Monday, September 12, 2005 7:30 AM singlepointof.contact@la.gov; hsees@dhh.la.gov; SPILLYARDS, JEFFREY Louisiana State Police Hazardous Material Incident # 05-06321
Importanc	I confirm about 3 h reports r	Importance:	Importance:	Importance:	Importance:	High
AND	Orig	AND NOT	AND NOT	AND NOT		INFORMATION IS FOR EMERGENCY RESPONSE PURPOSES PUBLIC DISTRIBUTION WITHOUT PRIOR STATE POLICE APPROVAL
INCIDENT HOTLINE 877-925-	Sent: Tue To: single Subject: Importance	INCIDENT # HOTLINE 877-925-659	INCIDENT # HOTLINE 877-925-659	INCIDENT # HOTLINE 877-925-659	INCIDENT # 05-0 HOTLINE 877-925-6595 /	
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******	TIAL REE	******	** (INITIAI ************ CALLER'S NA	** (INITIAL *********** CALLER'S NA CALLER'S AD 764 8611 /	CALLER'S NAME: CALLER'S ADDRES	ORT) CALLER INFORMATION ********************************** Jeff Spillyards S OR EMPLOYER: Entergy NUMBER: 501-258-6531
		:PORT) DE		** (INITIAL		ORT) RESPONSIBLE PARTY
* (INIT	IAL REP	ORT) DET	AILS	su commit APTONANCE TODAYER		: P O Box 551, TCBY 25 E, ATTN Jeff Spillyards Little Rock, AR 72203

** (INITIAL REPORT) DETAILS

Hurricane Katrina damaged three pole-mounted transformers, causing them to lose their contents... Mineral oil spilled onto pavement... Cleanup will be completed this morning...

** (UPDA ** (INITI ********* FIRE: ANY OFF-SIT NO FATAL FIRE: ANY OFF-SIT NO FATAL FIRE: ANY OFF-SIT NO FATAL FIRE: RELEASE FF NO FATAL FIRE: RELEASE FF RELEASE FF NO FATAL FIRE: RELEASE FF RELEASE FF NO FATAL FIRE: RELEASE FF NO FATAL FIRE: RELEASE FF NO FATAL FIRE: RELEASE FF FATAL FIRE: NO FATAL FIRE:	** (UPDA ****** PERSON/R PHONE:	PLANNED A ANY OFF-S	RELEASE EFF FIRE: INJUF	RELEASED TO ANY OFF-SIT NO RELEASE EFF	WHERE IS AI IF MONITORI ANY OFF-SIT No	No RELEASE EFFECTS: FIRE: No INJURIES: No :
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In cc

PROCLAMATION

BY THE

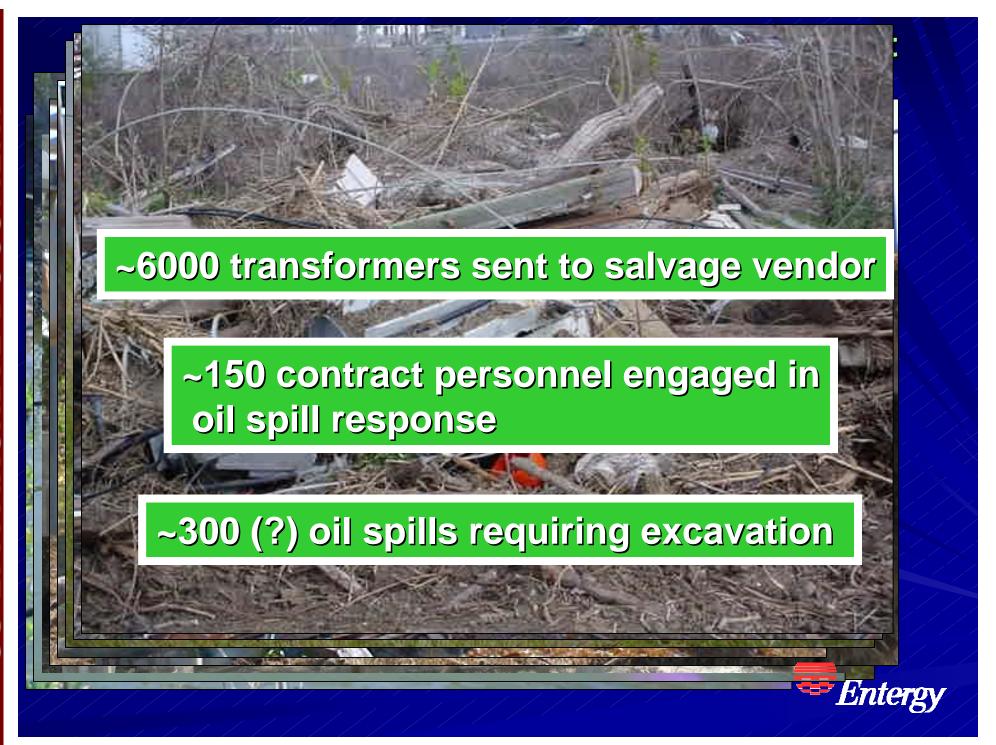
Covernor of the State of Texas

SS...

...resulted in the timeframe for notification being expanded to 72 hours. Consequently, there was not a similar governmental process available for more "real-time" notifications for utilities engaged in infrastructure repair in Texas.







ELI Avenue C Substation—Low Voltage Oil Circuit Breaker



Substation: AVENUE C Component: HV OIL CIRCUIT BREAKER Sub Position: N0423
Oil Circuit Breaker Data...

Gallons
PerTank:

710.00

Number
ofTanks:

1
3
Total
Gallons:
2,130.00

Ave. C--112.4(a) Report

22



and

ELI Grand Isle Substation—Auto Transformer and Regulators



Grand Isle--112.4(a) Report

Report

Report

Report



24

Electrical infrastructure repair in coastal marsh...





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"COMPLETELY SHI James," he says. "I reliable estimate on "unless something i

Placid was awarded Ivan last year. It ho 72 million-barrel Ba Aug. 29. SPR's four open and undamag

Port, which remains be reached for comment. imported crude, about 10% or 0.0. weekly imports.

Louisiana coast, has its own power source.

"Power is our biggest need... It shouldn't take us terribly long to get back once we get power," he says. LOOP could resume offloading vessels once power is restored "probably within a matter of hours."

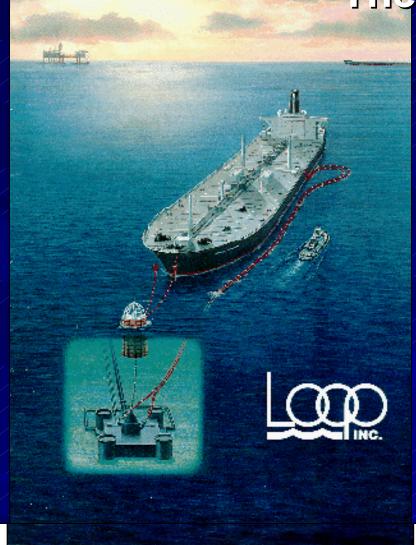
FURTHER ASSESSMENT. A more extensive assessment of LOOP will be carried out shortly, the spokesman says. Additional testing of the offshore terminal can be done only once power is restored.

Power loss to the area surrounding the Capline and LOCAP crude pipelines were keeping both lines down on Aug. 30, according to a source close to the lines' operations. The Shell-operated (RD) 1.1 million b/d Capline was shut late Aug. 28. It's not clear when LOCAP, which connects Capline to LOOP, was shut.

LOCAP is operated by LOOP and has a capacity in excess of 1 million b/d. Capline carries crude from St. James, La., to Patoka, III. Shell and LOOP officials couldn't be reached for comment.



The "LOOP"







Tankers offload at LOOP by pumping crude oil through hoses connected

to a Single Point Mooring (SPM) base. Some of these vessels require water depths of 85 feet—the water depth at each of LOOP's SPMs is 115 feet. Three SPMs are located 8,000 feet from the Marine Terminal. The SPMs are designed to handle ships up to 700,000 deadweight tons. The SPMs are 21 feet in diameter, 46 feet high and are anchored to a seabed base with an anchor chain. Mooring lines connect the bow of a tanker to the buoy and flexible hoses are used to transport crude oil from the tanker to a submarine pipeline. The buoy and hoses can rotate a full 360 degrees allowing the tanker to maintain a heading of least resistance to wind and waves.

The "LOOP"





The "LOOP"—to get electrical power here...



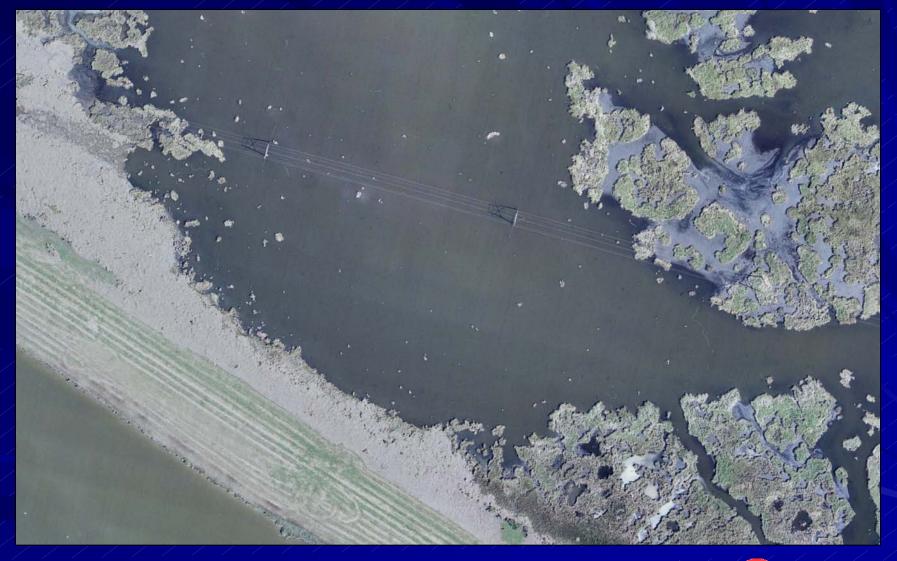


...lines have to go through a lot of this...





and this.





Major dilemma:

--How does Entergy balance the need for expedited infrastructure repair with protection of the marsh?

--How does Entergy avoid being assessed mitigation responsibilities for impacts from the hurricane?



Entergy preemptive notification process...

SPILLYARDS, JEFFREY

From: SPILLYARDS, JEFFREY

Sent: Thursday, September 01, 2005 11:47 AM

To: 'Rocky Hinds'; raymond.b.gonzales@mvn02.usace.army.mil

Cc: David Evans--EPA Oil Program; LONGINOTTI, JAMES C; BARLOW, CHUCK D; SAVOYE, MARGARET

JENKINS; HIMEL, EDMOND E; ZEMANEK, JOHN H; MCMANUS, LAURA S; LABORDE, MICHAEL J; SMITH,

WALTER D; Bill Pittman; Honker.William@epamail.epa.gov

Subject: RE: Fourchon oil terminal power restoration

Importance: High

I understand. We are in the process of flying the lines to assess damage. In the marsh areas we are attempting to obtain pre-work video for photodocumentation. The major concern is, due to what can be extremely expensive on-site, in-kind mitigation for such work, that could add an additional, very significant, cost burden to what we're already up against if we expedite the work. Is a per acre "fee in-lieu of" mitigation an option here? That would allow for more accurate cost projections for the work. One of the concerns is defending, from the reconstruction cost recovery perspective, why we did, what we did. --Jeff

----Original Message----

From: Rocky Hinds [mailto:rockyh@dnr.state.la.us] Sent: Thursday, September 01, 2005 11:29 AM

To: SPILLYARDS, JEFFREY; raymond.b.gonzales@mvn02.usace.army.mil

Cc: David Evans--EPA Oil Program; LONGINOTTI, JAMES C; BARLOW, CHUCK D; SAVOYE, MARGARET JENKINS; HIMEL,

EDMOND E; ZEMANEK, JOHN H; MCMANUS, LAURA S; LABORDE, MICHAEL J; SMITH, WALTER D; Bill Pittman;

Honker.William@epamail.epa.gov

Subject: RE: Fourchon oil terminal power restoration

I can give you authorization to do the work, but I can't waive state laws requiring mitigation for impacts to vegetated wetlands. We will assess the impacts following the work, rather then the usual up front determination. I'd encourage pre/post-construction photos (not necessarily aerials) to help document what was at the site. As we've discussed before, contractor sensitivity to the environment and the possible impacts caused by the equipment will be paramount.

r



ce to e hon le gy's

ite. I

MEL,

Entergy preemptive notification process...

----Original Message----

From: Rocky Hinds [mailto:rockyh@dnr.state.la.us]

Sent: Friday, September 02, 2005 2:17 PM

To: Guynes, Beth S MVK; Susan.Hampton@mvd02.usace.army.mil; TraciJohnson@dotd.louisiana.gov; info@lmoga.com; SPILLYARDS, JEFFREY; Michael Barbella; John Parker; Yarrow Etheredge; hammer@lsu.edu;

John.F.Ettinger@MVN02.USACE.ARMY.MIL; Igremm@gremminger.com; Tre.Wharton@c-ka.com; (Mr.) Kelly Haggar; Aaron Bass; Andrew MacInnes; Anna Gray; Ben Summerlin; Brad DeHart; Cale LeBlanc; Claudia Schrull; Daniel.Bollich@c-ka.com; Dave Richard; David Lewis; Dennis Manuel; Donna Hollier; Faye Talbot; Greg Ryals; Gregory DuCote; Jeff DeBlieux; Jess Curole; Jill Mastrototaro; Jim Rives; John Mattingly; Jon Truxillo; Judge Edwards; Karl Morgan; Kasey Hebert; Kenneth Babin; Linda Pace; Lori Hodge; Marnie Winter; Mike Wascom; Pam Mattingly; pamela@jccteam.com; Paul Clifton; Randy Moertle; Richard Greig; Rick Hartman; Rocky Hinds; Rosalind; sglegal@lsu.edu; Shirley Rondeno; Terry Howey; Thomas August; tim allen; Vicki Murillo; Vickie Dufforc

Subject: Special public notice for Hurricane Katrina

Hello ladies and gentlemen,

I've been asked to transmit this special public notice to you. Please feel free to distribute it to your co-workers and other interested parties as you see appropriate.

r

Special Public Notice

The Secretary of the Department of Natural Resources has determined that damage done to the infrastructure in that part of the Louisiana Coastal Zone impacted by Hurricane Katrina and its aftermath has resulted in an emergency situation and that damage is covered by the emergency use provisions of the Rules and Procedure For Coastal Use Permits. Further, the Secretary has determined that due to fact that Hurricane Katrina has caused an impact of statewide significance, all emergency uses under the jurisdiction of the Louisiana Coastal Resources Program which are necessitated for response to Hurricane Katrina and its aftermath shall be considered to be uses of state concern

Because of the overwhelming destruction associated with Hurricane Katrina, the Department of Natural Resources, Coastal Management Division is temporarily modifying its usual emergency authorization procedures for storm related repair/restoration projects located east of and including Terrebonne Parish. This modification applies ONLY to those activities needed to restore infrastructure. The Department requests that emergency users be as environmentally sensitive as possible in conducting repair operations.

The Secretary is also authorizing those activities necessary to prevent additional damages. In the event that new construction is needed, an after-the-fact permit application might be required.

In the event that emergency repairs are needed, emergency users are authorized to commence the necessary work at the earliest opportunity. The Coastal Management Division reminds emergency users to provide the Department with notification via letter, email, or fax as soon as possible for documentation purposes. The notification should include the



Entergy preemptive notification process...

SPILLYARDS, JEFFREY

From: Hampton, Susan MVD [Susan.Hampton@mvd02.usace.army.mil]

Sent: Friday, September 02, 2005 5:25 PM

To: SPILLYARDS, JEFFREY

Subject: RE: Special public notice for Hurricane Katrina

Give me a call please – 601-634-5821. I am working on the emergency permit for local, State and Federal agencies and am considering adding utilities, etc. Thanks.

Susan P. Hampton
Vicksburg and Memphis District Support Team
Regulatory Community of Practice Leader
Environmental Compliance Community of Practice Leader
(601)634-5821 (601)634-5816 fax (601)831-5821 Cell



The result...



REPLY TO

DEPARTMENT OF THE ARMY

MISSISSIPPI VALLEY DIVISION, CORPS OF ENGINEERS P.O. BOX 80 VICKSBURG, MISSISSIPPI 39181-0080

CEMVD-PD-KM

3 September 2005

EMERGENCY PERMIT PROCEDURES FOR THE STATES OF LOUISIANA AND MISSISSIPPI WITHIN THE BOUNDARIES OF THE MISSISSIPPI VALLEY DIVISION

New Orleans and Vicksburg Districts. This emergency procedure is also being extended to utility companies, electrical, phone, and pipelines, including natural gas distribution systems. In addition, road and railroad transportation projects are included.

- 3. By regulation, "an emergency" is defined as a situation which would result in an unacceptable hazard to life, a significant loss of property, or an immediate, unforeseen, and significant economic hardship if corrective action requiring a permit is not undertaken within a time period less than the normal time needed to process the application under standard procedures. These emergency procedures are being put in place to save lives and property and to restore some infrastructure.
- 4. This Emergency Permitting Procedure has been coordinated with the following Federal and state agencies:
 - a. EPA Regions IV and VI
 - b. U.S. Fish and Wildlife Service, Lafayette Office
 - c. FEMA
 - d. Council on Environmental Quality





Electrical infrastructure repair in coastal marsh...

- To reduce damage to marsh Entergy utilized helicopters where possible.
- Attempts were made to minimized travel through marsh by surface vehicles.
- Before and after photos were taken of work areas for the purpose of documenting impacts.





Equipment used--airboats



Equipment used—marsh budgies



And a lot of very dedicated people...



